

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF EASTERN NEW YORK**

MARTIN JONATHAN BATALLA VIDAL,
ANTONIO ALARCON, ELIANA FERNANDEZ,
CARLOS VARGAS, MARIANO
MONDRAGON, and CAROLINA FUNG FENG,
on behalf of themselves and all other similarly
situated individuals, and MAKE THE ROAD
NEW YORK, on behalf of itself, its members, its
clients, and all similarly situated individuals.

Plaintiffs,

v.

KIRSTJEN M. NIELSEN, Secretary of the
Department of Homeland Security, JEFFERSON
BEAUREGARD SESSIONS III, Attorney General
of the United States, and DONALD J. TRUMP,
President of the United States,

Defendants.

Case No. 1:16-cv-04756 (NGG) (JO)

**MOTION TO WITHDRAW AS
COUNSEL**

MOTION TO WITHDRAW AS COUNSEL

PLEASE TAKE NOTICE THAT counsel for Plaintiffs hereby moves the Court for an Order, pursuant to Local Rule 1.4 to allow Karen C. Tumlin to withdraw as counsel of record for Plaintiffs in this matter as her employment with the National Immigration Law Center has concluded.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court enter an Order granting the motion to withdraw. A proposed order is attached.

Dated: November 20, 2018

Respectfully submitted,

/s/ Joshua Rosenthal
Joshua Rosenthal (JR 1096)
NATIONAL IMMIGRATION LAW CENTER

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2018 I electronically filed the foregoing Motion to Permit Withdrawal of Counsel and [Proposed] Order granting the same with the Clerk of the Court for the United States District Court for the Eastern District of New York by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Joshua Rosenthal
Joshua Rosenthal (JR 1096)